

From: [Yackulic, Ted](#)
To: ["Kurt Peterson"; "Macdonald, Kathryn \(ENRD\)"](#)
Subject: RE: Confidential FRE408 - RE: [External] contact information
Date: Friday, November 13, 2020 11:27:00 AM

Kurt,

Are you planning on inviting Solvay and Container Properties to the December meeting? Thanks.

Ted Yackulic, Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 10
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From: Kurt Peterson <kurt.peterson@pkglaw.com>

Sent: Thursday, November 12, 2020 1:04 PM

To: Macdonald, Kathryn (ENRD) <Kathryn.Macdonald@usdoj.gov>; Yackulic, Ted <yackulic.ted@epa.gov>

Subject: Confidential FRE408 - RE: [External] contact information
FRE 408 Settlement Communication/Confidential

Hi Kathryn (and Ted).

Good question. I represent numerous potentially responsible parties associated with the Former Rhone-Poulenc Site for periods prior to 1998. More specifically, I represent Bayer, which holds potential responsibility for the Pharmacia LLC (formerly Monsanto Chemical Company and the Monsanto Fund) operations/ownership period from approximately 1944- 1986, as well as potential responsibility for associated with the former Rhone Poulenc's (now Bayer CropScience) vanillin manufacturing operations period, which lasted from 1986-1991 after the sale of the facility from Monsanto to Rhone-Poulenc in 1986, and Rhone-Poulenc's ownership period, which ended when it sold the property in 1998 to Rhodia (now Solvay). Rhodia/Solvay sold the property to Container Properties LLC in 1998. While I do represent Bayer CropScience (who is a signatory to the FRPS RCRA AOC), I do not represent Solvay or Container Properties.

As you likely know, Bayer acquired Monsanto several years ago. This presented an emerging new opportunity to work on a more comprehensive and creative approach where Bayer, Bayer CropScience, Monsanto, Pharmacia, and other related stakeholders were willing to consider a more "holistic" and "results-oriented" approach through our Proactive Remediation & Restoration Proposal

I hope that helps answer your question. I'm happy to walk you through it in more detail if it would be helpful.

Thanks! Kurt.

Kurt Peterson

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From: Macdonald, Kathryn (ENRD) <Kathryn.Macdonald@usdoj.gov>

Sent: Thursday, November 12, 2020 6:30 AM

To: Yackulic, Ted <yackulic.ted@epa.gov>; Kurt Peterson <kurt.peterson@pkglaw.com>

Subject: RE: [External] contact information

Hello Kurt - Thank you for our call. Could you confirm who you are represent regarding this possible proposed project at the former Rhone Poulenc Site and Slip 6? I meant to ask that after I inquired about Container Properties. Thanks much, Kathryn

Kathryn C. Macdonald
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Environmental Enforcement Section
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150 M Street, NE, Suite 2.900
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From: Yackulic, Ted <yackulic.ted@epa.gov>

Sent: Tuesday, November 10, 2020 5:03 PM

To: Kurt Peterson <kurt.peterson@pkglaw.com>

Cc: Macdonald, Kathryn (ENRD) <KMacdonald@ENRD.USDOJ.GOV>

Subject: contact information